

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MARKET-DOMINANT PRICE CHANGE

Docket No. R2022-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
CHAIRMAN'S INFORMATION REQUEST NO. 2, QUESTIONS 1-6, 8, AND 9
(April 21, 2022)**

The United States Postal Service hereby provides its responses to Chairman's Information Request No. 2, issued on April 14, 2022. Questions 1-6, 8, and 9 are stated verbatim and followed by their responses. A response to question 7 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 21, 2022

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First-Class Mail

1. In Library Reference USPS-LR-R2022-1/1, Excel file "CAPCALC-FCM-R2022-1.xlsx," the Postal Service lists the current price for Presort Nonautomation Machinable Letter Round Trip Mailer (RTM) and Flat RTM pieces as \$0.461.¹ In Docket No. R2021-2, Library Reference PRC-LR-R2021-2/1, Excel file "PRC_CAPCALC-FCM-R2021-2.xlsx," the price approved by the Commission for Presort Nonautomation Machinable Letter and Flat RTM pieces was \$0.494.² Please reconcile this discrepancy and file an updated Library Reference USPS-LR-R2022-1/1, Excel file "CAPCALC-FCM-R2022-1.xlsx" if necessary.

Response:

The reason for the discrepancy is an oversight on part of the Postal Service in Docket No. R2021-2 that resulted in the same Nonautomation prices for Nonautomation Letter and Flat Round-Trip Mailers. This can be seen in the "Nonauto Prsrt Letters" and "Nonauto Prsrt Flats" tabs in the "PRC_CAPCALC-FCM-R2021-2.xlsx" Excel file.

In Docket No. R2021-2, the formerly unified price for Nonautomation Presort Letters was disaggregated into separate categories (Mixed AADC and AADC Letters) to align these products with their Marketing Mail counterparts. As part of Docket No. R2022-1, the Postal Service plans to offer the same structure for Letter and Flat Round-Trip Mailers. This change will bring the Round-Trip Mailer price structure in line with the Presort letter price structure implemented as part of Docket No. R2021-2. See United States Postal Service Notice of Market-Dominant Price Change, PRC Docket No. R2022-1 (Apr. 6, 2022), at 8.

¹ Library Reference USPS-LR-R2022-1/1, April 6, 2022, Excel file "CAPCALC-FCM-R2022-1.xlsx," tab "Nonauto Presort Letters," cells I15 and I16 and tab "Nonauto Presort Flats," cells H6 and H7.

² Docket No. R2021-2, Library Reference PRC-LR-R2021-2/1, July 19, 2021, Excel file "PRC_CAPCALC-FCM-R2021-2.xlsx," tab "Nonauto Prsrt Letters," cell L14 and tab "Nonauto Presort Flats," cell K5.

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Since these Round-Trip Mailers can also be sorted to Mixed AADC and AADC, as enumerated in sections 1110.5 and 1115.4 of the Mail Classification Schedule, the Postal Service decided to offer the lower (Nonautomation AADC Letter) price (\$0.461) that was approved by the Commission in Docket No. R2021-2 for Round-Trip Mailers as well.

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2. In the Notice, the Postal Service states that it is increasing the weight limit for Qualified Business Reply Mail (QBRM) to 3.5 ounces and instituting a uniform price for QBRM Letters up to 3.5 ounces. Notice at 8. The Postal Service states that “[t]he intended effect of these changes will be to reduce costs for the Postal Service....” *Id.* Please identify the ways in which the Postal Service expects these changes to reduce its costs and explain in detail the basis for its expectation.

Response:

The increased weight limit for QBRM Letters will move more mail into Intelligent Mail barcode Accounting (IMbA) to eliminate the need to weigh and rate letter-shaped QBRM, further reducing costs in both delivery units and in processing and distribution facilities. Manual weighing, rating, and invoicing requires labor-intensive handling, which this proposal is intended to reduce. In addition, the increased weight limit for QBRM Letters will allow a larger volume of mailpieces to be counted and invoiced using mail processing equipment, increasing throughput at Postal Service facilities and leading to faster presentment of QBRM mail to customers. The change also supports development of future enhancements to reduce processing, handling, and delivery time for QBRM and Business Reply Mail mailpieces.

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3. Please refer to Library Reference USPS-LR-R2022-1/NP1, Excel file "Inbound CAPCALC-FCMI-R2022-1.xlsx," tab "Terminal Dues."³ Please also refer to Universal Postal Union (UPU) Abidjan Congress proposal 20.29.1,⁴ UPU Abidjan Congress proposal 20.30.1.Rev 1,⁵ and International Bureau (IB) Circular 103.⁶
- a. Please confirm that IB Circular 103 reflects the rates later adopted by the UPU Congress in proposals 20.29.1 and 20.30.1.Rev 1, as well as the average composition of one kilogram of mail in proposal 20.29.1, paragraph 16, where applicable.
 - b. If question 3.a. is confirmed, please explain the differences in rates in the following cells: C18 and D19, C43 and D44, C49 and D50, C76 and D77, C82 and D83, C107 and D107, C109 and D109, and C113 and D113 in Library Reference USPS-LR-R2022-1/NP1, Excel file "Inbound CAPCALC-FCMI-R2022-1.xlsx," tab "Terminal Dues."
 - c. If question 3.a. is not confirmed, please explain and cite the sources for the rates in cells C18, C43, C49, C76, C82, C107, and C113 in Library Reference USPS-LR-R2022-1/NP1, Excel file "Inbound CAPCALC-FCMI-R2022-1.xlsx," tab "Terminal Dues."

Response:

- a. Confirmed.
- b. The rates in cells C18, C43, and C76 were used in the Postal Service's 2022 self-declared E format rates and in the Postal Service's notice of price adjustment in Docket No. R2021-2. See Docket No. CP2021-94, Notice of the United States Postal Service of Rates Not of General Applicability for Inbound E-Format Letter Post, and Application for Non-Public Treatment, May 14, 2021;

³ Library Reference USPS-LR-R2022-1/NP1, April 6, 2022, Excel file "Inbound CAPCALC-FCMI-R2022-1.xlsx," tab "Terminal Dues."

⁴ Proposal 20.29.1 to amend the Universal Postal Convention at the 27th UPU Congress, Article 29, Terminal dues. Provisions applicable to mail flows between designated operators of countries in the target system, March 17, 2020.

⁵ Proposal 20.30.1.Rev 1 to amend the Universal Postal Convention at the 27th UPU Congress, Article 30, Terminal dues. Provisions applicable to mail flows to, from and between designated operators of countries in the transitional system, June 28, 2021.

⁶ International Bureau Circular 103, Provisional 2022 quality-linked terminal dues rates, June 28, 2021.

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Docket No. R2021-2, USPS Notice of Filing USPS-LR-R2021-2-NP1, May 28, 2021. Specifically, the Postal Service used an exchange rate of 1.43599 as of April 30, 2021, to calculate preliminary low volume undifferentiated rates per kilogram. In contrast, the rates in cells D19, D44, and D77 are from Universal Postal Union International Bureau (IB) Circular 103, dated June 28, 2021, and used the average monthly exchange rate of the five-month period ending May 31, 2021, per then-numbered Convention Article 28bis, paragraph 1.

In cells C49 and C82, the Postal Service used the UPU Abidjan Congress proposal 20.30.1 Rev 1 maximum E rates under article 30 paragraph 9.1. Those maximum rates were used to calculate the UPU Exception rates in the Postal Service's 2022 self-declared E format rates and in the Postal Service's notice of price adjustment in Docket No. R2021-2. As shown in IB Circular 103, however, the maximum E format rates no longer apply, and thus the applicable rates set forth in IB Circular 103 were used in cells D50 and D83.

In cell C107, the Postal Service used the UPU Abidjan Congress proposal 20.30.1 Rev 1 maximum PG format rates in article 31, paragraph 5.1. Those maximum PG rates were used in the Postal Service's 2022 self-declared E format rates and in the Postal Service's notice of price adjustment in Docket No. R2021-2. However, as shown in IB Circular 103, the maximum PG format rates for Group IV countries only no longer apply, and cell D107 reflects this.

In cell C109, the Postal Service had applied a certain penalty deduction for Quality of Service Link (QSL)–related rates. As shown in IB Circular 103, however, the QSL deduction for PG format items from Group IV countries is

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constrained by the principle that the overall PG format rate cannot go below the minimum rate in Convention Article 31, paragraph 6.1. Hence, cell D109 reflects the minimum rate.

In cell C113, the Postal Service had applied a QSL penalty deduction to the Group IV Exception rate. As Convention Article 31, paragraph 11, sets a fixed rate, however, the QSL deduction does not apply. This is reflected in cell D113.

c. N/A.

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USPS Marketing Mail

4. 39 C.F.R. § 3030.122(d) requires that the Postal Service provide “[a] schedule of the planned rate adjustments, including a schedule identifying every change to the Mail Classification Schedule that will be necessary to implement the planned rate adjustments.” 39 C.F.R. § 3030.122(d). The Postal Service represents that it shows planned changes to the Mail Classification Schedule (MCS) in legislative format. Notice at 28 n.24.
- a. On page 51 of Revised Attachment A, the Postal Service adds new text related to new containerization workshare discounts for Saturation, Every Door Direct Mail, High Density Plus, and High Density flats in 5-Digit Containers.⁷ Please confirm that the changes under the heading “*Containerization Discounts*” on page 51 of Revised Attachment A should have appeared in underlined text showing the changes in legislative format. If not confirmed, please explain. If confirmed, please provide an updated Revised Attachment A page reflecting the changes.
 - b. On page 63 of Revised Attachment A, under the heading “*Forwarding-and-Return Service*,” the price for forwarded letters is \$0.54. Revised Attachment A at 63. Please confirm that \$0.54 should have appeared in underlined text showing the change in legislative format. If not confirmed, please explain. If confirmed, please provide an updated Revised Attachment A page reflecting the change.
 - c. Please confirm that all other MCS changes proposed in this proceeding are identified in legislative format by the Postal Service in Revised Attachment A. If not confirmed, please provide explanations for the additional changes needed and updated Revised Attachment A pages reflecting the changes in legislative format.

Response:

- a. Confirmed.
- b. Confirmed.
- c. All MCS changes are identified in legislative format and corrected pages are attached to these responses. Changes are detailed in the following table and highlighted in the attached pages:

⁷ United States Postal Service Notice of Filing Updated Mail Classification Schedule Language, April 12, 2022, Attachment A at 51 (Revised Attachment A).

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Affected Page Number and MCS Section	Explanation for Change
Page 4 (Table of Contents)	The Plus One market test had been removed without a strikethrough to indicate removal. The attached copy of this page uses a strikethrough to show the change.
Page 18 (1110.5)	The revised promotions in the April 12 Attachment A update did not include all changes to the "Personalized Color Transpromo Promotion" section. The attached copy of this page has been revised to match the March 31 revision to the MCS published on the PRC website.
Page 49 (1210.6)	The heading for "High Density Plus Flats (greater than 4.0 ounces)" was mistakenly deleted while compiling Attachment A. The attached copy of this page includes that heading again.
Page 68 (1225.4)	This correction was not indicated correctly in the April 12 Attachment A update. The attached copy of this page features appropriate strikethrough and underline marks.
Page 96 (1310.6)	This update was not indicated correctly in the April 12 Attachment A revision. The attached copy of this page shows the former "Firm Bundle Piece Price" in addition to the updated price, each with appropriate strikethrough and underline marks.

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5. On page 66 of Revised Attachment A, the Postal Service proposes to change "Nonautomation" to "Nonmachinable" in the heading for a size and weight limitations table. Id. at 66. Please confirm that this change is intended to correct a typographical error. If not confirmed, please explain the reason(s) for this change.

Response:

Confirmed. The change was intended to correct a typographical error.

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Periodicals

6. For First-Class Mail, the Postal Service states that “reported volumes for the new Seamless Acceptance incentive introduced in Docket No. R2021-1 are available for three quarters of the hybrid year, as the incentive went into effect on January 24, 2021. Therefore, the Postal Service is using Postal One data to determine qualifying volume for the portion of the hybrid year for Quarter 2 FY2021.” Notice at 11. For Periodicals, the Seamless Acceptance volumes for Quarter 2 FY2021 match the volumes in the Billing Determinants for Quarter 2 FY2021,⁸ not the Postal One data for Quarter 2 FY2021.⁹ Please confirm that the Seamless Acceptance volumes should match the Postal One data from Docket No. R2021-2, Library Reference USPS-LR-R2021-2/6. If confirmed, please provide an updated Library Reference USPS-LR-R2022-1/3, Excel file “USPS-CAPCALC-PER-R2022-1.xlsx.” If not confirmed, please explain.

Response:

Confirmed. The Postal Service has filed an updated Library Reference USPS-LR-R2022-1/3, named “(Revised) USPS-CAPCALC-PER-R2022-1.xlsx,” with these responses.

In addition, because the Postal Service made this correction, matching the Seamless Acceptance data to Postal One, there are two small adjustments to the percentage changes given for Outside County and Within County Periodicals in Table 13 of the Notice of Market Dominant Price change filed on April 6.¹⁰ The percentage increase for Outside County Periodicals is 0.001 percent higher, and the percentage increase for Within County Periodicals is 0.001 percent lower, with no overall change in percentage increase for the class. Table 13 now reads:

⁸ Docket No. ACR2021, Library Reference USPS-FY21-4, December 29, 2021, Excel file “FY21 Periodicals BDs.xlsx.”

⁹ Docket No. R2021-2, Library Reference USPS-LR-R2021-2/6, May 28, 2021, Excel file “Seamless Volumes R2021-2.xlsx,” tab “Periodicals.”

¹⁰ United States Postal Service Notice of Market-Dominant Price Change, April 6, 2022, at 19.

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Table 13

Periodicals Price Changes

Product	Percent Change
Outside County	[8.582]
Within County	[7.750]
Overall	[8.540]

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Special Services

7. The Postal Service proposes several classification changes related to Address Management Services. Revised Attachment A at 165, 172.
- a. For Multiline Accuracy Support System (MASS) Certification, the Postal Service proposes to end the practice of charging one-half the applicable fee for recertification of a machine due to a move, transfer, or upgrade. *Id.* at 165, 172. The Postal Service also proposes to have the initial test be provided at no charge with each subsequent test paying the applicable fee. *Id.* at 165.
 - i. Please explain the reason(s) the Postal Service proposes to end the practice of charging one-half the applicable fee for recertification of a machine due to a move, transfer, or upgrade.
 - ii. Please explain the reason(s) the Postal Service proposes to have the initial test be provided at no charge.
 - iii. Please confirm that page 170 of Revised Attachment A should have contained eight notes numbered “9” and four notes numbered “10” in strikethrough to show the proposed changes to MASS Certification in legislative format. If confirmed, please provide an updated Revised Attachment A page reflecting the changes. If not confirmed, please explain.
 - iv. Please explain whether an additional change is needed to the price table for MASS Certification to reflect that the Postal Service is proposing that the initial test be provided at no charge. *See id.* at 170. If an additional change is needed, please provide an updated Revised Attachment A page reflecting the change. If necessary, please also update Library Reference USPS-LR-R2022-1/5, Excel file “R2022-1 Special Services CapCalc.xlsx” to reflect this change.
 - b. For National Change of AddressLink (NCOALink) Service, the Postal Service proposes to remove language that states that there is “[n]o proration for fees for additional sites.” *Id.* at 172.
 - i. Please confirm that with the removal of this language the Postal Service intends to allow for proration of fees for additional sites.
 - ii. If question 7.b.i. is not confirmed, please explain why the Postal Service proposes to remove this language.
 - iii. If question 7.b.i. is confirmed, please explain the reason(s) the Postal Service proposes to allow for proration of fees for additional sites.
 - c. For Delivery Sequence File—2nd Generation (DSF2) Service, the Postal Service proposes to remove language that states that “[t]here is no proration for additional locations or platforms.” *Id.*

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- i. Please confirm that with the removal of this language the Postal Service intends to allow for proration for additional locations and platforms.
- ii. If question 7.c.i. is not confirmed, please explain why the Postal Service proposes to remove this language.
- iii. If question 7.c.i. is confirmed, please explain the reason(s) the Postal Service proposes to allow for proration for additional locations and platforms.

Response:

A response is forthcoming.

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8. The Postal Service proposes to add new Customized Address prices for Caller Service. *Id.* at 174.
- a. Please explain the reason(s) for creating a new category of prices for Customized Addresses. In the response, please include any market research, workpapers, or other analysis the Postal Service conducted or utilized in deciding to create this category.
 - b. Please explain whether a Customized Address customer would be charged only the Customized Address price to obtain Caller Service or whether such customer would also be charged the Group price and Caller Number Reservation price in addition to the Customized Address price.
 - c. Please explain or provide an example of how the Postal Service intends to express transactions and revenues for Customized Address in the Billing Determinants and future Special Services "CapCalc" files.

Response:

- a. The Postal Service is creating the new service in response to requests from mailers. The Postal Service did not conduct and market research, develop any workpapers or other analysis to support the decision to offer this service.
- b. The fees for the Customized Address are in additional to the Caller Service fee and the Call Number Reservation Fee.
- c. The Postal Service will report the number of transactions and the revenue collected for the service as it does for PO Box Keys and Locks, as a separate tab consisting of a table similar to the one below.

Customized Addresses

Transactions	
First Year	5
Additional Year	10
Revenue (\$)	
First Year	10,000
Additional Year	10,000

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9. In the Notice, the Postal Service states that “all Priority Mail will now include \$100 of insurance.” Notice at 26. The Postal Service reiterates this specifically with regard to Priority Mail Return service in the introductory information in its *Federal Register* notice concerning New Mailing Standards for Domestic Mailing Services Products, stating “the Postal Service is proposing to include the \$100.00 of insurance with Priority Mail Return service pieces.”¹¹ However, the revised proposed rule states “[i]nsurance is not included with the postage for Priority Mail Return service.” *Id.* at 21,603. Please reconcile this discrepancy.

Response:

The word “not” was included in error. The Postal Service will file a correction in the *Federal Register*.

¹¹ New Mailing Standards for Domestic Mailing Services Products, 87 Fed. Reg. 21,601, 21,601 (Apr. 12, 2022).

REVISED MCS PAGES FOR ATTACHMENT A

April 21, 2022

NEGOTIATED SERVICE AGREEMENTS*

Domestic*

International*

Inbound Market Dominant Multi-Service Agreements with Foreign
Postal Operators

NONPOSTAL SERVICES*

Alliances with the Private Sector to Defray Cost of Key Postal
Functions

Philatelic Sales

MARKET TESTS*

Plus One

Commercial PO Box Redirect Service

Extended Mail Forwarding

USPS Connect Local Mail

* Organizational class or group (not a Postal Service product)

recipient and scanned during the program period. To receive the rebate, registered customers must have distributed a Business Reply Mail, Courtesy Reply Mail, or Share Mail card or envelope, and must comply with all other eligibility requirements of the program. Mailers who have satisfied the Earned Value promotion requirements may apply the credit toward future mailings of First-Class Mail cards, letters, and flats and USPS Marketing Mail letters and flats.

Personalized Color Transpromo Promotion (July 1, 2022 to December 31, 2022)

Provide a three percent discount on qualifying postage for First-Class Mail presort and automation letters sent during the established program period. All mailpieces must contain bills or statements with dynamic variable color messaging. In addition, in mailpieces sent by a prior year's participant the color messaging **may will** be required to be personalized to the recipient, **unless it meets the exceptions in the program requirements for sales-related content**. The color messaging must be on the bill or statement and be for marketing or consumer information purposes. To receive the discount, mailers must comply with the eligibility requirements of the program.

Informed Delivery Promotion (August 1, 2022 to December 31, 2022)

Provide a four percent discount on the qualifying postage for First-Class Mail automation letters, postcards, and flats, and USPS Marketing Mail automation letters and flats that are sent during the established program period, and which incorporate Informed Delivery campaigns as a component of their mailings. To receive the discount, mailers must comply with the eligibility requirements of the program.

High Density Plus Flats (4.0 ounces or less)

Entry Point	Commercial (\$)	Nonprofit (\$)
Origin	0.275	0.181
DNDC	0.229	0.135
DSCF	0.214	0.120
DDU	0.195	0.101

High Density Plus Flats (greater than 4.0 ounces)

Charges are computed by multiplying the number of pieces in the mailing by the applicable per-piece price, multiplying the number of pounds of the mailing by the applicable per-pound price, and adding both totals.

a. Per Piece

	Commercial (\$)	Nonprofit (\$)
Per Piece	0.105	0.054

b. Per Pound

Entry Point	Commercial (\$)	Nonprofit (\$)
Origin	0.680	0.508
DNDC	0.497	0.325
DSCF	0.434	0.262
DDU	0.358	0.186

High Density Flats (4.0 ounces or less)

Entry Point	Commercial (\$)	Nonprofit (\$)
Origin	0.320	0.229
DNDC	0.274	0.183
DSCF	0.259	0.168
DDU	0.240	0.149

- ~~Nonautomation Nonmachinable~~
 - Commercial and Nonprofit eligible 5-Digit DSCF, DNDC, and Origin entry levels
Commercial and Nonprofit eligible
 - 3-Digit DSCF, DNDC, and Origin entry levels
Commercial and Nonprofit eligible
 - ADC DSCF, DNDC, and Origin entry levels
Commercial and Nonprofit eligible
 - Mixed ADC DNDC and Origin entry levels
Commercial and Nonprofit eligible
- Customized MarketMail
- Move Update Noncompliance Charge
- Move Update Assessment Charge

1225.5 Optional Features

The following additional postal services may be available in conjunction with the product specified in this section:

- Forwarding-and-Return Services
- Ancillary Services (1505)
 - Address Correction Service (1505.1)
 - Certificate of Mailing (1505.6)
- Full-service Intelligent Mail Option: Automation Flats Only
- Seamless Incentive: Automation Flats Only
- Picture Permit Imprint Indicia: Letters Only
- Emerging and Advanced Technology Promotion (March 1, 2022 to August 31, 2022)
- Earned Value Reply Mail Promotion (April 1, 2022 to June 30, 2022)
- Mobile Shopping Promotion (September 1, 2022 to December 31, 2022)
- Tactile, Sensory, and Interactive Mailpiece Engagement Promotion (February 1, 2022 to July 31, 2022)
- Informed Delivery Promotion (August 1, 2022 to December 31, 2022)

f. Firm Bundle Piece Price

Firm bundles are charged a single-piece price of ~~\$0.210~~\$0.220.

Bundle Prices (per bundle)

Bundle Level	Container Level				
	Carrier Route (\$)	5-Digit (\$)	3-Digit/SCF (\$)	ADC (\$)	Mixed ADC (\$)
Firm	0.165	0.165	0.428	0.476	0.681
Carrier Route	0.191	0.191	0.687	0.927	1.201
5-Digit		0.395	0.467	0.597	0.893
3-Digit/SFC			0.410	0.546	0.847
ADC				0.435	0.727
Mixed ADC					0.239

Container Prices (per pallet, tray, or sack)

a. Pallet Container

Entry Point	Carrier Route (\$)	5-Digit (\$)	3-Digit/SCF (\$)	ADC (\$)	Mixed ADC (\$)
DDU	3.062				
DSCF	30.623	46.523	28.566		
DADC	56.871	72.771	54.564	29.508	
DNDC	57.484	73.384	54.874	53.756	
Origin	80.891	96.791	76.341	77.252	20.091